

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

BARBARA ROSS O'NEIL	*	Case No. 17-52737-JPS
Debtor	*	Chapter 7
	*	
U.S. BANK TRUST NATIONAL ASSOCIATION	*	
AS TRUSTEE FOR BRACKENRIDGE	*	
MORTGAGE TRUST	*	
Movant	*	
	*	
V.	*	
	*	
BARBARA ROSS O'NEIL	*	
Respondent	*	

**RESPONSE TO NOTICE OF MORTGAGE PAYMENT CHANGE**

COMES NOW, BARBARA ROSS O'NEIL, Debtor / Respondent as set forth above, and files this Response to Notice of Mortgage Payment Change and respectfully shows the Court the following:

1.

This proceeding arises under 11 U.S.C. Chapter 13 of the Bankruptcy Code on the petition filed by the debtor on December 28, 2017.

2.

U.S. Bank Trust National Association as trustee for Brackenridge Mortgage Trust filed a Notice of Mortgage Payment Change as related to claim number 4 [Doc. No. 33] on December 7, 2022

3.

Movant's Notice of Mortgage Payment Change increases the monthly mortgage payment to \$1,837.99 per month as a result of anticipated insurance premium for property insurance of \$3,965.00 annually.

4.

Debtor / Respondent asserts that she has obtained property insurance with Nationwide at \$2,089.99 annually. Wherefore, Movant's Notice of Mortgage Payment Change should be amended to show a decrease in property insurance, escrow, and mortgage payments.

WHEREFORE, Debtor respectfully requests:

- (a) That Movant's Notice of Mortgage Payment Change be amended or withdrawn;
- (b) That all costs be assessed against Movant;
- (c) That debtor have such other and further relief as is just and proper.

Dated: January 3, 2023.

Respectfully submitted,

/s/ Daniel L. Wilder  
Daniel L. Wilder  
Bar No. 141448  
Attorney for Respondent,  
EMMETT L. GOODMAN, JR., LLC  
544 Mulberry Street, Suite 800  
Macon, GA 31201  
Telephone: (478) 745-5415  
Email: bkydept@goodmanlaw.org

**CERTIFICATE OF SERVICE**

I, Daniel L. Wilder, do certify that I have served a true and correct copy of the within and foregoing Response to Notice of Mortgage Payment Change by depositing a copy of the same to each in the United States Mail in a properly addressed envelope with adequate postage thereon to:

Barbara Ross O'Neil  
5178 Sand Hill Circle N  
Lizella GA 31052

Rushmore Loan Management Services  
PO Box 55004  
Irvine, CA 92619-2708

U.S. Bank Trust National Association as trustee for Brackenridge Mortgage Trust  
c/o Aldridge Pite, LLP  
4375 Jutland Dr., Suite 200  
San Diego, CA. 92177

Camille Hope  
Chapter 13 Trustee  
P. O. Box 954  
Macon GA 31202

Dated: January 3, 2023.

Respectfully submitted,

/s/ Daniel L. Wilder  
Daniel L. Wilder  
Bar No. 141448  
Attorney for Respondent,  
EMMETT L. GOODMAN, JR., LLC  
544 Mulberry Street, Suite 800  
Macon, GA 31201  
Telephone: (478) 745-5415  
Email: bkydept@goodmanlaw.org